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October 25, 2023

Via ECF

Hon. Lorna Gail Schofield
U.S. District Court, Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Josh Withers v. SRmedia Digital Publishing LLC*
Docket No: 1:23-cv-06036-LGS

Dear Judge Schofield:

We represent plaintiff Josh Withers ("Plaintiff") in the above-captioned matter and write pursuant to Section I.B.3 of the Court's Individual Practices to respectfully request an additional brief extension of the deadline for Plaintiff to move for entry of default judgment against defendant SRmedia Digital Publishing LLC ("Defendant") pursuant to Federal Rule of Civil Procedure 55(b)(2), for an additional thirty (30) days, to November 26, 2023.

On September 25, 2023, the Court granted Plaintiff's first request for an extension of the original deadline to October 27, 2023, so as to permit Plaintiff the opportunity to attempt to contact the defaulting defendant so as to avoid the waste of judicial resources, which would result from Defendant filing an appearance only after a motion for default judgment had been filed. [Dkt. No. 22]. Defendant has since contacted the undersigned regarding this matter and a possible resolution of same.

As such, in light of Defendant's contact, Plaintiff respectfully requests an additional thirty (30) days, extending the Plaintiff's deadline to move for entry of default judgment to November 26, 2023, so as to permit the parties time to either resolve this matter, for Defendant to formally appear and otherwise respond to the complaint or, in the alternative, for Plaintiff to proceed with filing the motion for entry of default judgment.

Thank you for your consideration of this request.

Respectfully submitted,

/s/ Jaymie Sabilia-Heffert
Jaymie Sabilia-Heffert

Application **GRANTED**. Plaintiff shall move for entry of default judgment by **November 28, 2023**.

Dated: October 26, 2023
New York, New York

A handwritten signature in black ink, appearing to read "Lorna G. Schofield", written over a horizontal line.

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE